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for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

STEFANELLI INVESTORS GROUP, ANTHONY  
E. STEFANELLI, JR., as general partner of  
Stefanelli Investors Group and individually,  
MINOR 1, MINOR 2, MINOR 3, MARY ANN  
STEFANELLI, as general partner of Stefanelli

Adv. Pro. No. 10-05255 (SMB)

Investors Group and individually, JOAN L. APISA, DANIELLE L. D'ESPOSITO, MARK STEFANELLI, as general partner of Stefanelli Investors Group and individually, MINOR 4, as general partner of Stefanelli Investors Group and individually, MINOR 5, as general partner of Stefanelli Investors Group and individually, BARBARA ANN STEFANELLI, as general partner of Stefanelli Investors Group and individually, LISA M. STEFANELLI, as general partner of Stefanelli Investors Group and individually, PATRICIA MORETTA, as general partner of Stefanelli Investors Group and individually, MINOR 6, as general partner of Stefanelli Investors Group and individually, MINOR 7, as general partner of Stefanelli Investors Group and individually, ANTON LEROY, as general partner of Stefanelli Investors Group and individually and ANTHONY E. STEFANELLI, as general partner of Stefanelli Investors Group and individually,

Defendants.

### **NOTICE OF MEDIATION REFERRAL**

On November 10, 2010, this Court entered the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order")<sup>1</sup> [Adv. Pro. No. 08-01789 (SMB), Dkt. No. 3141]. Pursuant to the Notice of Applicability filed by Plaintiff Irving H. Picard (the "Trustee"), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS") under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.* ("SIPA"), and the substantively consolidated estate of Bernard L. Madoff individually ("Madoff"), in this

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<sup>1</sup> All terms not defined herein shall be given the meaning ascribed to them in the Order.

Adversary Proceeding on December 9, 2010 [Dkt. No. 2], the Order and the avoidance procedures contained therein (the “Avoidance Procedures”) are applicable to the instant matter.

Pursuant to the Avoidance Procedures, the Trustee and Defendants may jointly agree to enter mediation prior to or upon completion of discovery without further court order. Avoidance Procedures, ¶ 5A.

Through this Notice of Mediation Referral, the Trustee and Defendants Stefanelli Investors Group, Anthony E. Stefanelli, Jr., as general partner of Stefanelli Investors Group and individually, Minor 1, Minor 2, Minor 3, Mary Ann Stefanelli, as general partner of Stefanelli Investors Group and individually, Mark Stefanelli, as general partner of Stefanelli Investors Group and individually, Minor 4, as general partner of Stefanelli Investors Group and individually, Minor 5, as general partner of Stefanelli Investors Group and individually, Barbara Ann Stefanelli, as general partner of Stefanelli Investors Group and individually, Lisa M. Stefanelli, as general partner of Stefanelli Investors Group and individually, Patricia Moretta, as general partner of Stefanelli Investors Group and individually, Minor 6, as general partner of Stefanelli Investors Group and individually, Minor 7, as general partner of Stefanelli Investors Group and individually, Anton Leroy, as general partner of Stefanelli Investors Group and individually, and Anthony E. Stefanelli, as general partner of Stefanelli Investors Group and individually (the “Parties”) hereby mutually agree to enter mediation.

Pursuant to the Avoidance Procedures, the Parties agree that within 14 calendar days after the filing of this Notice of Mediation Referral, the Parties shall choose a mediator in accordance with the Mediation Order. If the Parties are unable to agree on a mediator, the Court shall appoint one in accordance with the Mediation Order.

Dated: New York, New York

June 9, 2014

Of Counsel:

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